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May 8, 2023

By ECF and Email

The Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Daniel Kleeberg et al. v. Lester Eber et al.*, 1:16-cv-09517-LAK-KHP
Joint Request to Extend All Deadlines


Dear Judge Kaplan,

I write on behalf of all parties to respectfully request that the Court extend all of today's deadlines by two weeks, to May 22, 2023. Over the weekend, the parties made substantial progress towards a settlement that would avoid or narrow much of the post-trial briefing that is currently due today. Indeed, there is an agreement on most if not all material terms, but the precise language for a release and its scope has yet to be determined.

As of this writing, Defendants' opposition to Plaintiffs' Rule 60 Motion is due today and has not been previously extended. In addition, Plaintiffs' bill of costs and Motion for Attorney Fees is due today pursuant to a prior extension granted by the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,



Brian C. Brook

cc: All counsel of record